

ATTACHMENT 4

Accessible



SOUTHWESTERN BELL – Clarification of Use of Related Purchase Order Number (RPON) Field

Date: November 3, 1999

Number: CLEC99-147

Contact: Southwestern Bell Account Manager

This Accessible Letter provides a clarification on the use of the RPON (Related Purchase Order Number) Field contained on the LSR. RPON is an optional field that can serve administrative and/or operational needs.

Per our discussion in the TPUC Open Meeting on October 21, 1999, CLECs have requested to relate two LSRs – one for conversion of an UNE-Loop with Number Portability and one for a new UNE-Loop. If the CLEC desires a Desired Frame Due Time (DFDT) on the new UNE-loop, the Coordinated Hot Cut (CHC) field and the DFDT field must be populated. If the CLEC also desires the new UNE-Loop LSR to be related with the conversion LSR, the RPON field on both LSRs must also be populated. This resolution is available immediately and will also provide a permanent solution.

If CLECs request additional requirements for the RPON field, these will be handled via the Change Management Process.

The CLEC Handbook has been updated in Resale, sub-section "Related Orders" under 3.3.2 – General Ordering via the LSOR and in UNE, sub-section "Related Orders" under 9.0 – General Ordering via the LSOR to reflect the changes agreed to by the CLECs, Telcordia and SWBT as follows:

"The Related Order Number (RPON) field on the LSR identifies the Purchase Order Number (PON) of a related service request as determined by the CLEC. The RPON field may be used on manual or non-MOG (Mechanical Order Generator) eligible LSRs for relating multiple requests for the same location and due date. For these type service requests, it is the CLEC's responsibility to:

- *Coordinate and cross-reference related requests*
- *Issue the related LSR when applicable*
- *Populate the RPON field with the associated PON when applicable*
- *Issue LSRs in immediate succession; failure to do so can result in the LSRs being rejected*

If the RPON field is populated on manual or non-MOG eligible LSRs, and the related LSR is not issued, the LSC will reject the LSR containing the RPON.

IMPORTANT: The RPON field is not recognized on MOG eligible LSRs that are mechanically submitted.

If the CLEC wishes to issue a supplement LSR on which firm order confirmations (FOCs) have been returned, a separate supplement must be submitted for each LSR when the requested change is applicable to all requests.

NOTE: Verbal supplements will not be accepted.

For additional information regarding RPONs, refer to the on-line LSOR, Section 6, LSR, Field Number 44."

The LSOR will also be updated for the RPON field in the next revision with a reference note as follows:

"Please refer to the CLEC Handbook for specific exceptions."

Questions should be directed to your Account Manager.

ATTACHMENT 5

From: BANNER, BOB G (SWBT) [<mailto:rb5422@txmail.sbc.com>]
Sent: Monday, April 24, 2000 3:36 PM
To: Chambers, Julie S, NLSSS
Subject: RE: production lines for testing

Julie,
SWBT has reviewed your request and after consideration has determined that our Wholesale organization cannot support our involvement in setting up, installing and administrating residential test lines into AT&T's office complex for AT&T to do production testing. Any account set ups that SWBT Wholesale would be involved in would have to be in our test environment. Should AT&T feel the need to install lines for production testing they will need to handle that directly with the SWBT Retail organization. Please call should you have any questions.

Thanks,
Robert Bannecker

Account Manager - Industry Markets
Southwestern Bell Telephone Company
311 So. Akard, Rm. 630.08
Dallas, TX 75202
214-464-1053 - Office
214-858-0281 - Fax
888-961-8352 - Pager
rb5422@txmail.sbc.com - E-Mail

ATTACHMENT 6

WORKSHOP

PROJECT NO. 20400

PUBLIC UTILITY COMMISSION

MONDAY, APRIL 17, 2000

KENNEDY REPORTING SERVICE, INC.

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<p>TRANSCRIPT OF PROCEEDINGS</p> <p>BEFORE THE</p> <p>THE PUBLIC UTILITY COMMISSION OF TEXAS</p> <p>AUSTIN, TEXAS</p> <p>SECTION 271 COMPLIANCE) PUC PROJECT NO. MONITORING OF SOUTHWESTERN BELL) 20400 TELEPHONE COMPANY OF TEXAS)</p> <p>WORKSHOP</p> <p>MONDAY, APRIL 17, 2000</p> <p>BE IT REMEMBERED THAT at 9:12 a.m. on Monday, the 17th day of April 2000, the above-entitled matter came on for hearing at the Offices of the Public Utility Commission of Texas, 1701 North Congress Avenue, 7th Floor, Commissioners Hearing Room, Austin, Texas 78701, before DONNA NELSON and NARA SRINIVASA; and the following proceedings were reported by Aloma J. Kennedy, Kim Pence, and William Beardmore, Certified Shorthand Reporters of:</p>	<p>Page 3</p> <p>1 interface between Performance Measure 9 and 2 integration of the pre-order and order systems 3 and just how a CLEC who wants to integrate pre- 4 order and order would do so in terms of getting 5 information from Southwestern Bell on 6 integration. If somebody from Southwestern Bell 7 could do that, that would be helpful. 8 MS. LAWSON: I guess I got 9 elected. 10 MS. NELSON: And before we get 11 started, though, let's go ahead and take 12 everybody's appearances. My name is Donna 13 Nelson. I'm with staff. And with me is Nara 14 Srinivasa and Jennifer Fagan. 15 And I'm going to let you introduce 16 yourself, David. 17 MR. STUEVEN: David Stueven from 18 the Missouri Commission. 19 MS. NELSON: Okay. Let's start 20 with Southwestern Bell and have the people who 21 are going to be testifying today or speaking 22 today on behalf of Southwestern Bell subject 23 matter experts, if you would introduce 24 yourselves first. 25 MR. DYSART: Randy Dysart,</p>
<p>Page 2</p> <p>1 PROCEEDINGS 2 MONDAY, APRIL 17, 2000 3 (9:12 a.m.) 4 MS. NELSON: Okay. Let's go on 5 the record in Project No. 20400, Section 271 6 Compliance Monitoring of Southwestern Bell 7 Telephone Company of Texas. Today we're going 8 to be covering OSS issues as well as recent 9 performance under Tier 2 measurements. And at 10 3 o'clock, we're going to move to coordinated 11 hot cuts frame due time issues for probably 12 about an hour or an hour and a half. Whether or 13 not we end at that point in the day for OSS 14 depends on how far we get through the issues. 15 Initially, our thought is that we're 16 going to address the issue of integration before 17 we take up the proposed new measures. And I'm 18 wondering if that's the most efficient way to do 19 it. If any of the parties here disagree with 20 that way of doing it, if you could let us know 21 right now, that would be helpful. 22 Okay. Hearing no objections, that's 23 how we'll proceed. 24 I would like to start by having 25 Southwestern Bell outline on the record the</p>	<p>Page 4</p> <p>1 Southwestern Bell. 2 MR. NOLAND: Brian Noland, 3 Southwestern Bell. 4 MS. CULLEN: Angie Cullen, 5 Southwestern Bell. 6 MS. LAWSON: Beth Lawson 7 Southwestern Bell. 8 MS. NELSON: Okay. Anyone else 9 from Southwestern Bell? 10 MS. EGGEN: Mary Ann Eggen, 11 Southwestern Bell. 12 MS. SALAS: Angie Salas, 13 Southwestern Bell. 14 MR. CHAPMAN: Carol Chapman, 15 Southwestern Bell. 16 MS. DILLARD: Maria Dillard, 17 Southwestern Bell. 18 MS. COX: Lori Cox, Southwestern 19 Bell. 20 MR. McFARLAND: J. D. McFarland, 21 Southwestern Bell. 22 MR. MAPES: Andy Mapes with 23 Southwestern Bell. 24 MR. BERRINGER: John Berringer, 25 Southwestern Bell.</p>

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<p>1 MR. LOCUS: John Locus, 2 Southwestern Bell. 3 MR. FRISA: Ed Frisa, Southwestern 4 Bell. 5 MR. BAUTISTO: Rick Bautisto, 6 Southwestern Bell. 7 MS. NELSON: Okay. And then if 8 the rest of the parties will go ahead and 9 introduce themselves if they intend to 10 participate in today's workshop. 11 MR. HALL: Lori Hall, AT&T. 12 MR. WILLARD: Walt Willard, AT&T. 13 MS. CHAMBERS: Julie Chambers, 14 AT&T. 15 MS. YEE: Grace Yee, AT&T. 16 MS. GENTRY: Jo Gentry, IP 17 Communications. 18 MS. LOPEZ: Ann Lopez, Rhythms. 19 MS. NELSON: Could you stand up if 20 you are past the front row, please. 21 MS. LOPEZ: Ann Lopez, Rhythms. 22 MS. KRABILL: Nancy Krabill with 23 Nextlink. 24 MS. NELSON: Okay. Is there 25 anyone else who intends to participate in</p>	<p>1 Bourianoff on behalf of AT&T, along with 2 Kathleen LaValle and Pat Cowlshaw. 3 MS. MUDGE: Katherine Mudge on 4 behalf of Rhythms. 5 MR. GOODPASTOR: Chris Goodpastor 6 on behalf of Covad. 7 MS. HARTLINE: Rina Hartline on 8 behalf of Birch Telecom. 9 MR. MORRIS: Stephen F. Morris on 10 behalf of MCI WorldCom. We would also like to 11 introduce Marc Goldman who is our local counsel 12 in Washington, a member in good standing in the 13 District of Columbia Bar. He is also entering 14 an appearance today on behalf of MCI WorldCom. 15 MS. NELSON: Thank you. 16 Let's go ahead and get the people who 17 intend to discuss OSS issues up to the table 18 with Southwestern Bell, and then we'll start 19 with Southwestern Bell doing an overview. 20 On the break, if you would bring your 21 cards up to the Court Reporter or come up and 22 spell your name, it would be helpful because she 23 heard lots of different names. And as we go on 24 today, if you would identify yourself every time 25 you speak, at least initially, that would be</p>
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<p>1 today's workshop? 2 MR. BURLEY: David Burley, MCI 3 WorldCom. 4 MR. SAUDER: T. J. Sauder, Birch 5 Telecom. 6 MS. KETTLER: Patti Kettler, Birch 7 Telecom. 8 MR. GOLDMAN: Marc Goldman, MCI 9 WorldCom. 10 MR. MORRIS: Stephen F. Morris, 11 MCI WorldCom. 12 MS. McMILLON: Terri McMillon, MCI 13 WorldCom. 14 MS. TAUTE: Barbara Taute with 15 Sprint. 16 MS. NELSON: Okay. And then if we 17 could go ahead and have an attorney for each 18 company make an appearance on behalf of that 19 attorney and the other attorneys who are here 20 present for the Company. We'll start with 21 Southwestern Bell. 22 MR. MURRAY: Kelly Murray with 23 Southwestern Bell and Tim Leahy with 24 Southwestern Bell. 25 MS. BOURIANOFF: Michelle</p>	<p>1 helpful to the Court Reporter. 2 Okay. Ms. Lawson. 3 MS. LAWSON: This is Beth Lawson 4 with Southwestern Bell, and I'm going to talk 5 about the interfaces that are available for 6 integration -- am I too close? 7 MS. NELSON: No, you're not close 8 enough. 9 MR. LAWSON: Okay. -- about the 10 interfaces available for integration. We have 11 three interfaces that are application-to- 12 application pre-ordering. They are DataGate, 13 and then EDI and CORBA. EDI and CORBA are the 14 industry standard TCIF -- T-C-I-F --interfaces. 15 We have one app-to-app interface for ordering -- 16 this is EDI -- which is also an industry 17 standard interface. 18 In advance of the EDI/CORBA 19 pre-ordering interfaces being decided by the 20 industry, DataGate was implemented in advance to 21 offer a pre-ordering interface. With these 22 interfaces being what we call application-to- 23 application, it allows for fields to be 24 integrated between the interfaces. 25 So, for example, with the pre-ordering</p>

<p>Page 9</p> <p>1 interfaces, the fields that exist that you pull 2 up can be, in effect, populated on a local 3 service request that you would want to transmit 4 over the EDI ordering interface. 5 It also allows you to take the 6 information that you obtain in the pre-ordering 7 interfaces, and then you can move that data over 8 into your back-end systems. So, in other words, 9 if a CLEC had a customer care database that they 10 wanted to also populate those pieces of 11 information that they're pulling from the 12 pre-ordering information, they could do that 13 with app-to-app interfaces, which these all are. 14 Would you like, Ms. Nelson, for me to 15 go ahead and talk about some of the ways 16 Southwestern Bell supports the CLECs and moving 17 forward on integration? 18 MS. NELSON: Yes, that's what I 19 would like for you to outline, please. 20 MS. LAWSON: One of the things 21 that we have sent out April 4th was an 22 accessible letter, and there is an integration 23 workshop that is being held June 21st to work 24 with the technical folks to see if the CLECs 25 have questions, and our technical SMEs will be</p>	<p>Page 11</p> <p>1 example, on service address, it would be 14973 2 Straub Hill Lane. So 14973 would be the street 3 number. Straub Hill Lane would be the street 4 name -- or Lane would be the thoroughfare -- 5 excuse me. So it would be in one string of 6 data. 7 When you look at the local service 8 request, which is OBF-approved, and OBF 9 determined how the fields would be populated on 10 the local service request, those are individual 11 fields. So you have a separate field for street 12 number, you have a separate field for street 13 name, and a separate field for thoroughfare as 14 well as some others. 15 For instance, like directional, if you 16 have a suffix to your street number or street 17 name, those types of things are separate fields. 18 So to be able to do it from a customer 19 service record, you have to take that string of 20 data and then populate it in the individual 21 fields. Southwestern Bell provides 22 documentation to show the delimiters and how you 23 can pull the street number from that string of 24 data. 25 MR. SRINIVASA: When you say</p>
<p>Page 10</p> <p>1 available to see what types of issues or 2 questions or concerns the CLECs have. 3 In addition to that, Southwestern Bell 4 has contracted with GEIS as an outside 5 consultant to work with the CLECs at their 6 request, to determine what type of interfaces 7 would be best for their business needs, to work 8 with them; if they're having problems with 9 integration, to assist them with that. And 10 these were identified also in a supplemental 11 affidavit that Elizabeth Hamm filed on April the 12 5th. 13 And I believe in the open meeting -- I 14 can't get my weeks straight -- I think it was 15 last week, John Mason gave an update with the 16 Texas PUC about the review that Telcordia is 17 doing of the documentation and the interfaces, 18 and a report will be published from Telcordia. 19 MS. NELSON: Okay. Could you 20 explain how parsing -- the relationship of 21 parsing to integration. 22 MS. LAWSON: Okay. When you look 23 at a customer service record, the way 24 Southwestern Bell maintains that data in their 25 back-end systems is a single stream. So, for</p>	<p>Page 12</p> <p>1 "string of data," these different fields, are 2 they separated by comma? 3 MS. LAWSON: They're delimiters. 4 MR. SRINIVASA: Delimiters. 5 MS. LAWSON: It's either a space 6 or a virgule or something like that and a 7 certain number of fields that they would be. 8 The other example of parsing that we 9 talked about is when we get an address 10 validation. And on a new connect -- we don't 11 have a customer service record, of course, so on 12 a new connect, you look at address validation. 13 And for EDI/CORBA, those are already parsed. So 14 when you pull that information back, that is 15 already in a parsed format that you can then 16 populate on the LSR that's in a parsed format, 17 based on how OBF designed the LSR. 18 Did I do that slow enough, Ms. Nelson? 19 MS. NELSON: Yes. Thank you. 20 Go ahead, Nara. 21 MR. SRINIVASA: Let me ask you, if 22 the information that's obtained from the 23 customer service record, although it is string, 24 you stated that they are delimited. So in order 25 to separate them out into different fields,</p>

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1 somewhere at the CLEC end, there has got to be a
2 program to recognize the delimiter and identify
3 that it's a separate field so that it can be
4 populated in the LSR. Is that correct?

5 MS. LAWSON: That is correct. And
6 that's the reason Southwestern Bell provides a
7 documentation that provides for that. And also
8 when you look at an app-to-app, that means that
9 there is going to be programming on the CLEC
10 side.

11 So a CLEC has to have a programmer or
12 either they have to hire a vendor to do the
13 programming for them. That's the difference on
14 an application-to-application versus a GUI, a
15 graphical user interface. It allows the
16 flexibility for the CLECs to populate the LSR as
17 well as populate their databases and their
18 customer care back-end systems as they desire.

19 MR. SRINIVASA: Okay. What
20 happens in the GUI type of -- graphic user
21 interface? You said after that, they will have
22 to have a program to separate this out and
23 populate if it's a graphic user or GUI type of
24 interface.

25 MS. LAWSON: On a graphical user

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1 they're developing clearinghouses where they'll
2 go in and do it from across all ILECs because
3 when you look at EDI and CORBA pre-ordering and
4 EDI ordering, that's an interface that's an
5 industry standard across all the ILECs in the
6 United States.

7 MR. SRINIVASA: EDI/CORBA. is that
8 an application-to-application type of interface
9 or is it a graphical user interface?

10 MS. LAWSON: It's app-to-app, yes.

11 MR. SRINIVASA: Okay. Prior to
12 CORBA, you had implemented DataGate.

13 MS. LAWSON: Yes.

14 MR. SRINIVASA: Was that a
15 graphical user interface?

16 MS. LAWSON: No. That's
17 application-to-application. And Southwestern
18 Bell implemented that in advance of the industry
19 standards. So we did not wait till all the
20 pre-ordering transactions had been completed at
21 TCIF because we knew the CLECs wanted to start
22 getting into business, and they wanted to
23 program and have the flexibility of an app-to-
24 app. And that's the reason Southwestern Bell in
25 advance implemented DataGate. And then once EDI

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1 interface, the examples that we have are
2 VERIGATE and LEX. VERIGATE is the interface
3 that provides for the pre-ordering, and LEX is
4 the ordering interface. And basically, there
5 you do a copy and paste functionality to move
6 the data over.

7 MR. SRINIVASA: So they have to
8 highlight -- say, for example, the CSR
9 information is still in a string format. Right?

10 MS. LAWSON: Right.

11 MR. SRINIVASA: With the
12 delimiters separating out the street number and
13 the street name and the thoroughfare and
14 whatever other designations you have, they have
15 to copy, highlight each portion separately and
16 then paste them, copy them and paste them?

17 MS. LAWSON: And move them over,
18 right, to the LSR fields.

19 MR. SRINIVASA: Okay. That's only
20 on the graphical user interface?

21 MS. LAWSON: And that's the reason
22 our large users are going to be utilizing
23 probably EDI interface, and they'll either
24 program it themselves or there's vendors now in
25 the industry that are doing that for CLECs, and

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1 and CORBA became approved by the industry, then
2 Southwestern Bell implemented that as well.

3 MS. NELSON: Could you explain
4 what -- Southwestern Bell has recently sent out
5 an accessible letter, my understanding is,
6 regarding what's required for a CLEC to populate
7 on a conversion order and a change that's being
8 proposed by Southwestern Bell. Could you
9 discuss that.

10 MS. LAWSON: That's correct. I
11 was trying to get the exact date of the
12 accessible letter.

13 The accessible letter was sent out
14 March 29th. What this accessible letter is
15 talking about is making a change that on a
16 conversion for a basic loop/port, or loop with
17 port, that no longer would the service address
18 be required on the LSR. And if the service
19 address is populated, it will be ignored for the
20 population of creating a service order.

21 So it basically allows for these types
22 of conversion activity and as-is for the service
23 address because it will be -- whatever currently
24 exists today for that end user will be the
25 address that is populated.

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1 MS. NELSON: Right. And is that
2 going through the change management process?
3 MS. LAWSON: Yes, ma'am, it is,
4 and we had the walk-through on that April 5th,
5 either 4th or 5th, whatever the Friday was, and
6 we did have approval from all CLECs to implement
7 that. So that will be going in the May release.

8 MS. NELSON: Okay.

9 MR. SRINIVASA: Let me ask the
10 CLECs, the explanation provided to us by
11 Southwestern Bell, is that your understanding?
12 If you have a different perspective of that,
13 would you explain that to us, please.

14 Please identify yourself before you
15 speak.

16 MS. CHAMBERS: This is Julie
17 Chambers with AT&T.

18 I think as Beth laid it out, that does
19 describe the issues and the association with
20 integration of pre-order and order. Would you
21 like to hear some of AT&T's insight into this
22 issue as well?

23 MR. SRINIVASA: Yes, your
24 experience.

25 MS. CHAMBERS: Experience.

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1 MS. NELSON: And I think we're
2 interested in your integration. And to make
3 this helpful, it would be helpful to the
4 Commission staff if we knew what your company
5 had done from an integration standpoint so we
6 know what you're talking about and if you're
7 going to discuss problems that you've had, that
8 you've raised in the past.

9 MS. CHAMBERS: Okay. Basically,
10 AT&T began working with Southwestern Bell on
11 these issues, you know, several years ago. And
12 since probably November of '98, we've been
13 talking to Southwestern Bell about the issues
14 associated with parsing of the address.

15 And at that point in time, you have to
16 recognize that that was prior to EDI/CORBA being
17 available. So AT&T chose to utilize DataGate
18 for pre-order, and that has been the basis of
19 our development.

20 You know, in doing so, I mean, as far
21 as AT&T's implementation of some type of
22 integration, Beth is correct in that it does
23 require programming on the CLEC side to actually
24 do the integration. It's not something that
25 Southwestern Bell does. It's really, you know,

1 a requirement of the CLEC or the responsibility
2 of the CLEC. However, you're utilizing
3 information that's provided from Southwestern
4 Bell.

5 So it requires, you know, documentation
6 and technical support and, you know, an under-
7 standing of how they're going to provide you the
8 data which then you're going to resubmit back to
9 Southwestern Bell. So although it is
10 programming required by the CLEC, it's
11 definitely, you know, dependent upon how
12 Southwestern Bell's back-end systems and their
13 databases are structured.

14 You know, our intention was to
15 integrate pre-order and order. And I think, you
16 know, some of the staff and the Commission has
17 seen, you know, AT&T's system, and we thought we
18 were working toward that. It's only through
19 really when you get into, you know, doing
20 business and you realize the problems that we've
21 had associated with the integration, that we've
22 learned that we were not successful at doing it.
23 And we've yet to really hear of any CLEC that
24 using DataGate from an address validation
25 perspective has successfully integrated DataGate

1 and EDI.

2 And the examples that Beth mentioned
3 were utilizing the CSR which, you know, all
4 along AT&T had been told to utilize address
5 validation and not the CSR. And so that's
6 really the basis of the way that we've
7 structured our, you know, pre-order system.

8 So to use address validation, still
9 with DataGate, it is not provided back in a
10 parsed format. Beth mentioned that it is with
11 EDI/CORBA, but with DataGate it is not, so it
12 does require you to take a concatenated field
13 from pre-order and attempt to split that out and
14 put that on the proper fields on an LSR.

15 MR. SRINIVASA: You say prior to
16 obtaining this information from -- now you've
17 learned that it's from CSR -- that you were told
18 that you need to obtain that from address
19 validation?

20 MS. CHAMBERS: Yes. It's actually
21 just recently that we've learned to utilize the
22 CSR. The method that DataGate -- the
23 documentations really suggest that you should
24 use address validation for the purpose of
25 populating the address. And --

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<p>1 MR. SRINIVASA: The data which is 2 there in address validation told me these are 3 concatenated fields -- these are not in the 4 string format with the delimiters, separated by 5 space or whatever the delimiters are? 6 MS. CHAMBERS: Right. It's not 7 set delimiters as it must be on the CSR. And 8 also it's just through really learning that 9 we've found that something like avenue, an 10 avenue could be a city -- I mean, a street name. 11 Excuse me -- when in the documentation it really 12 supports that that should be a thoroughfare. 13 So you program your systems to, you 14 know, put "Avenue" in the thoroughfare field 15 versus "Avenue" as a street name. So there's 16 just inherent, you know, problems with trying to 17 figure that out on a one-by-one basis. 18 With -- 19 MS. NELSON: Before you move on -- 20 MS. CHAMBERS: Yes. 21 MS. NELSON: -- I wondered if 22 Southwestern Bell wanted to respond to when you 23 said you have yet to hear of a CLEC who has 24 successfully integrated order and pre-order. 25 And I think we want to hear from other CLECs</p>	<p>1 concatenated field means like it's a group of 2 data fields. 3 MR. SRINIVASA: There are no 4 delimiters in those? 5 MS. LAWSON: Yes, just like there 6 is with the address validation. The point I was 7 trying to make is, even if a CLEC -- to our 8 knowledge, there may have been some CLECs that 9 have been done this that just haven't brought it 10 to our knowledge with DataGate, to take the 11 pieces of information from address validation. 12 The point I was trying to make is what 13 two CLECs have done that have notified the FCC 14 have done it with the customer service record 15 which is the same type of programming logic that 16 you would use in doing the address validation 17 piece. 18 And portions of the DataGate address 19 validation are parsed. The city, state, and zip 20 are already parsed. So some of the DataGate 21 information for address validation is partially 22 parsed. And, of course, with the EDI/CORBA, as 23 Ms. Chambers mentioned, it is fully parsed. And 24 my understanding is, AT&T is starting to test 25 and has tested successfully with CORBA using the</p>
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<p>1 today, but I'm not so sure all CLECs are here, 2 so I just don't want to leave that sort of 3 hanging out there if Southwestern Bell wants to 4 respond to that. 5 MS. LAWSON: Yes, sir, thank you, 6 Ms. Nelson. This is Beth Lawson with 7 Southwestern Bell. 8 I did want to mention that we have two 9 CLECs that filed ex partes with the FCC, Sage 10 and Navigator. Both have taken the concatenated 11 fields from DataGate and been able to take those 12 parsed fields and put them on an LSR. 13 So whether it's a customer service 14 record or the address validation transaction, 15 both of those from DataGate are the same type of 16 logic in that they are a concatenated field that 17 they have to take and then parse it onto a local 18 service request. 19 Also, I might mention that my -- I'm 20 sorry. Nara, did you have a question? I didn't 21 want to -- 22 MR. SRINIVASA: Yes. When you say 23 "string data versus the concat, what is the 24 difference between the two? 25 MS. LAWSON: It's the same. A</p>	<p>1 address validation. 2 MR. WILLARD: I would like to be 3 on the record. 4 MS. NELSON: Would you identify 5 yourself. 6 MR. WILLARD: Walt Willard with 7 AT&T. I would like to go on the record. 8 We have never integrated the pre-order 9 with the order. Indeed, we have tested CORBA as 10 a single transaction, which is address 11 validation. AVQ is transaction type. 12 MS. NELSON: Have you integrated 13 DataGate with EDI in terms of order and 14 pre-order? 15 MS. CHAMBERS: That's what I was 16 trying to address initially -- Julie Chambers 17 with AT&T. 18 Our intentions, you know, were and are 19 to integrate DataGate with EDI. We have yet to 20 do so. We have asked for, you know, 21 documentation such as when they implemented EDI/ 22 CORBA with the address vali, you know, parsing 23 of the address in EDI/CORBA, and we've asked for 24 that parsing logic, you know, any clues to 25 assist in our ability to do that integration.</p>

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1 And, you know, here we are. We're
2 still faced with trial and error. As recently
3 as February, we met with the account team, you
4 know, our AT&T account team. And, you know,
5 they recognized that we had been asking for this
6 information.
7 You know, I understand that there's a
8 workshop in a couple of months. I know that,
9 you know, we have requested to have the
10 consulting with GEIS and have not heard
11 anything, you know, as of yet.
12 So it is not a lack of trying. Perhaps
13 we didn't ask the right question, but we have
14 definitely been interested and been pursuing
15 this since the beginning of our development.
16 MR. SRINIVASA: Well, how are you
17 placing your orders today if you haven't
18 integrated -- typing everything?
19 MS. CHAMBERS: No. I think this
20 is why you see rejects, is because we are
21 relying on a system to try to do that. It does
22 require then additional manual work to correct
23 those problems or, you know, rejects that are
24 then returned.
25 MR. SRINIVASA: Reject rates are

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1 dropping. What do you attribute it to percent-
2 wise?
3 MS. CHAMBERS: You mean total
4 rejects, Nara?
5 MR. SRINIVASA: Right, for the
6 industry, for all the CLEC orders.
7 MS. CHAMBERS: I think that
8 there's a couple of things that I attribute that
9 to. There was a change back in September for
10 how the rejects were calculated. And then also
11 in January, Southwestern Bell implemented the
12 post-FOC jeopardy. So now any rejects would
13 actually be returned as jeopardies rather than
14 rejects.
15 So we've seen actually -- I guess from
16 December up until now, jeopardies have increased
17 from, say, 82 in December to 916 in March. So
18 as rejects might be dropping because they're now
19 just captured in a different category, which is
20 jeopardies, is perhaps one very valid reason --
21 MR. SRINIVASA: So --
22 MS. CHAMBERS: -- that they have
23 declined.
24 MR. SRINIVASA: Let me ask MCI, if
25 you are trying to mass market your products, how

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1 are you intending to do without having some sort
2 of integration already built in? You're not
3 going to type individual orders separately, are
4 you?
5 MR. BURLEY: That's what we're
6 doing.
7 MR. SRINIVASA: But if you're
8 planning to do mass entry, that skill --
9 MR. BURLEY: You certainly don't
10 want to -- the manual entry world. You're
11 exactly correct.
12 THE REPORTER: Would you please
13 identify yourself for the record.
14 MR. BURLEY: I'm sorry. Dave
15 Burley from MCI WorldCom.
16 There are some things that you can
17 integrate right now. There are some fields that
18 are absolutely perfect. ATN, account telephone
19 number, is an exact match between pre-ordering/
20 ordering. We're able to integrate that and
21 properly complete an order for that field.
22 The service address field and there's a
23 few other fields that are still in a
24 concatenated format. It's our intention to have
25 a fully automated integrated system whereby the

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1 information that you receive in your pre-order
2 transaction does a couple of things.
3 One is in the format necessary to
4 compile a firm local service request. Two has
5 the valid values that will pass the edits within
6 SWBT's or the processing system.
7 You don't just want to get across 2943
8 Ridgeway Avenue. You want to ensure that we
9 both are correctly abbreviating the thoroughfare
10 in the way that you want it and the way the
11 order processing edits are set up.
12 So we want to ensure that we're getting
13 across fully and completely to initiate the LSR
14 but also the fact that we're both abbreviating
15 it correctly or have the same standard
16 abbreviations.
17 There are some fields that you are able
18 to bring across in the SWBT pre-order
19 transaction and integrate into our EDI ordering.
20 It's not a great number. A great deal of it --
21 you are precisely correct -- and part is manual
22 intervention. That's not the way you want to
23 run the show.
24 But in that string field, the
25 concatenated address field, I can certainly see

<p>Page 29</p> <p>1 the delimiter relative to like the community 2 name, and I move to there, but I haven't seen 3 any of the rules regarding how to put or 4 interpret the thoroughfare value within there. 5 MR. SRINIVASA: So the 6 documentation that you have reviewed is not 7 clear to you. 8 MR. BURLEY: And I'm not saying 9 I've reviewed every bit of documentation. I 10 reviewed a few hundred pages, trying to ensure 11 that I've been able to build it correctly or 12 interpret it correctly. I haven't read every 13 single thing, but I've read quite a bit. 14 MS. NELSON: Will the change 15 discussed by Ms. Lawson with regard to using 16 telephone numbers only on conversions address 17 some of the parsing issue? 18 MR. BURLEY: It's a significant 19 interim step, and MCI has certainly supported 20 that. For the migration type conversion orders, 21 by us not having to populate the address or if 22 we do populate the address -- and the way I 23 understand it, SWBT is not going to edit it, and 24 they're going to populate the address and 25 internal processes -- I still have questions</p>	<p>Page 31</p> <p>1 MCI WorldCom, through their account manager with 2 Southwestern Bell, is working with a vendor that 3 is going to provide the integration of the 4 pre-order and order, using our interfaces. I 5 didn't hear that mentioned. And our account 6 manager is here, and she is working with MCI and 7 that vendor to move forward on that. 8 Also, the comment that Ms. Chambers 9 made about the jeopardies, I just wanted to make 10 sure -- I know you were asking the general 11 question about rejects, but I wanted to make 12 sure it was very clear that when you talk about 13 jeopardies and we get back to an address and 14 parsing issue, address up front, and they would 15 not be considered a jeopardy. 16 So when you look at the parsing and the 17 address situation, that wouldn't have moved to a 18 jeopardy type situation. That would be the MOG 19 edits and then LASR GUI edits that would be the 20 rejects. 21 MS. NELSON: Did Southwestern Bell 22 move other edits back? 23 MS. LAWSON: There were some that 24 were, depending on if the FOC had been sent, 25 that it would be a jeopardy at that point</p>
<p>Page 30</p> <p>1 regarding supplemental transactions or 2 additional requests that we maybe initiate 3 following the conversion order. 4 We convert you from Party A to Party B, 5 but tomorrow I want to issue another order to 6 change a feature or to do something that may 7 need an address, I don't believe in that 8 instance I can submit or exclude the address. 9 MS. NELSON: Ms. Lawson, could you 10 respond to that. 11 MS. LAWSON: It's the LSOR 12 requirements for a change activity. The change 13 that we're talking about making is for 14 conversion activity when you go from retail or 15 resale to the basic loop or port or loop with 16 port. 17 So in subsequent order activity other 18 than the conversion, it will be whatever the 19 current requirements are per the LSOR. 20 There's a couple of things I would like 21 to respond to whenever it's appropriate. 22 MR. SRINIVASA: Please go ahead. 23 MS. LAWSON: Okay. I would like 24 to mention -- this is Beth Lawson with 25 Southwestern Bell -- that my understanding is,</p>	<p>Page 32</p> <p>1 because before this change took place, LSE 2 sometimes would send a reject back and it became 3 an agreement that after the FOC had been sent 4 that any subsequent errors or problems at that 5 point would be considered a jeopardy and would 6 be sent back with a jeopardy code. 7 MS. NELSON: Does that affect your 8 flow-through rates? How is that captured in the 9 form of -- 10 MS. LAWSON: Well, it's after FOC 11 flow-through stops at SORD when you're 12 distributing SORD, so that would be at FOC time. 13 So if something happened after FOC, that 14 wouldn't impact flow-through. 15 MR. SRINIVASA: So the order went 16 through all the way; it was MOGable, assuming 17 that subsequently when it hit the back-end 18 system, you found some errors and that's when 19 the reject was sent back? 20 MS. LAWSON: Right, and so that 21 was after FOC. So flow-through is only taken 22 into account through the FOC. So if there was 23 activity that took place after that, then that 24 would not impact flow-through from the 25 definition that's been defined.</p>

<p>Page 33</p> <p>1 MS. NELSON: So how it captured in 2 the performance measures? 3 MS. LAWSON: Jeopardies? 4 MS. NELSON: Right. 5 MS. LAWSON: To my knowledge -- 6 I'm trying now to look at my performance 7 measurement assistant. 8 MR. DYSART: This is Randy Dysart 9 with Southwestern Bell. 10 Currently we don't have any measurement 11 on jeopardies. 12 MS. HALL: This is Lori Hall for 13 AT&T. 14 I just wanted to make a clarification, 15 that there are address rejects that appear as 16 jeopardy. For instance, AT&T for UNE-P orders, 17 36 percent of the jeopardies were attributed to 18 address issues. For UNE-L, 19 percent of the 19 jeopardies were attributed to address issues. 20 MS. NELSON: And what type of 21 address issues? 22 MS. HALL: Oh, I'm sorry. I 23 wanted to make a clarification. 23 percent of 24 the UNE-P jeopardies were attributed to address 25 issues.</p>	<p>Page 35</p> <p>1 MS. NELSON: Okay. Go ahead. 2 MR. NOLAND: Yes. This is Brian 3 Noland with Southwestern Bell. 4 On a post-FOC jeopardy, I mean, the 5 address that went through was a valid address. 6 It could have been that once the installer went 7 out or technician got to the field, that the 8 address was incorrect for the end user that the 9 service was being provided for, so it could have 10 been the reason for the jeopardy notification. 11 MS. LAWSON: This is Beth Lawson. 12 It wouldn't be related to a parsing or 13 how the address was able to be populated on the 14 local service request. 15 MS. NELSON: So, in other words, 16 what you're saying is, it's not related to 17 integration issues? 18 MS. LAWSON: Yes, ma'am, that's 19 what -- 20 MS. NELSON: It's related to other 21 mistakes or whatever? 22 MS. LAWSON: That is correct. 23 MS. NELSON: Right. And I guess 24 my question would be, who would the mistake be 25 attributable to? Would it be a CLEC-caused</p>
<p>Page 34</p> <p>1 MS. NELSON: And what type of 2 address issues? 3 MS. HALL: Actually, it could be 4 field visit determined address invalid. 5 MS. NELSON: Okay. Address 6 invalid, is that a parsing problem? 7 MS. HALL: It could be, was my 8 understanding. 9 MR. SRINIVASA: So, for example, 10 if -- 11 MS. NELSON: Wait. Let me just 12 have her finish going through the list of what 13 address issues are related and coming back as 14 jeopardies. 15 (Pause in proceedings) 16 MS. NELSON: Let me go ahead. I'm 17 just waiting for a response from AT&T. 18 Well, while you're looking for that, I 19 really want to know what type of address issues 20 are coming back as jeopardies and what types 21 would be caught in up-front edits and would come 22 back as rejects. 23 MS. MURRAY: I think we do have 24 some. I don't think it was directly to that 25 point but some clarification.</p>	<p>Page 36</p> <p>1 error or a Southwestern Bell-caused error? And 2 I don't know if we can get into that kind of 3 detail without going through case-by-case. 4 MS. HALL: I don't think it would 5 be either. 6 MS. KETTLER: My comments -- this 7 is Patti Kettler with Birch Telecom. 8 We've experienced a great deal of 9 problems in this area. Part of the issue is -- 10 a significant part of the issue is not related 11 to parsing, per se, but to an inconsistency in 12 Southwestern Bell's databases. Many of the 13 provisioning systems work off of a LFACS-based 14 addressing source, and that's where the 15 inconsistency lies. 16 So when they go to dispatch someone, 17 there is an inconsistency between what's on the 18 SORD order and what's in the LFACS system. And, 19 consequently, they will jeopardy it back then 20 saying it's an invalid address. 21 And bringing that back to the primary 22 point of a reduction in rejects, it does go to 23 the issue of many of those problems have now 24 moved to the back-end; in other words, they're 25 not jeopardies anymore, and that is -- or not</p>

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1 rejects anymore, and that is a significant
2 explanation for the reduction in rejects as
3 opposed to any front-end edits or parsing type
4 of activities.
5 MR. SRINTVASA: Now, let me ask
6 this: Inconsistency -- the customer service
7 record information comes in either from PREMIS
8 or CRIS database. Is that correct?
9 MS. LAWSON: That is correct.
10 MR. SRINTVASA: That's the billing
11 address?
12 MS. LAWSON: This is Beth Lawson,
13 Southwestern Bell.
14 The customer service record is
15 maintained in the CRIS billing system, so that
16 is where the service address is on the
17 customer's service record. And then also you
18 have the service address that is utilized on the
19 address validation from the PREMIS system.
20 MR. SRINTVASA: So the service
21 record is the actual location of the customer?
22 MS. LAWSON: Yes.
23 MR. SRINTVASA: What you have in
24 the CSR is the billing address, which could be
25 different than the actual service?

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1 MS. LAWSON: The customer service
2 record has different addresses on it. It could
3 have a listed address, a building address, and a
4 service address. And those are identified on
5 the customer's service record by field
6 identifiers to identify which specifically
7 addresses are on there.
8 MR. SRINTVASA: If those two are
9 different, how do you know -- on the LSR, how
10 can they populate two different addresses for
11 the same telephone number -- billing address
12 would be different than the actual service
13 address?
14 MS. LAWSON: Well, you're looking
15 at a service address for what you want to put
16 for the end user as far as where you want the
17 service provisioned, so that would be the
18 address that would be utilized.
19 MR. SRINTVASA: Okay.
20 MS. LAWSON: And they should be
21 aware that there is a difference between what is
22 in the PREMIS database and the CRIS customer
23 service record because as street names are
24 changed, then PREMIS gets updated from
25 notification from municipalities, and there's

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1 subsequent order activity that Southwestern Bell
2 initiates to also sync up the CRIS service
3 address on those.
4 And the change was no longer requiring
5 the service address on the conversion activity.
6 If there is any inconsistency between PREMIS and
7 CRIS, then Southwestern Bell will take care of
8 that.
9 MS. CHAMBERS: Right. And,
10 actually -- this is Julie Chambers with AT&T --
11 and I've heard that the discrepancy between the
12 PREMIS and CRIS database is not insignificant
13 but can at times be up to 5 percent. So my
14 understanding of how the new address requirement
15 is going to be implemented would be that if
16 there is a discrepancy between the CRIS and
17 PREMIS database, that order would fall out and
18 then result in manual handling by the LSC.
19 So I think that that should then affect
20 the flow-through measure. If it was actually,
21 you know, say, up to 5 percent, I would think
22 that we would see a decrease in the flow-
23 through.
24 MR. SRINTVASA: Let me understand
25 this: You know, on Enterprise, which has multi

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1 campuses, they may have one billing address.
2 They may prefer bills to be sent to one, but the
3 services may be to different addresses. So it's
4 the customer's preference that the CRIS database
5 reflect a different address than the actual
6 service address. Is that true?
7 MS. LAWSON: Maybe if I could help
8 you visualize -- this is Beth Lawson -- on a
9 customer service record, you're giving all of
10 that type of information. So when you look at a
11 customer's service record, you'll see listed
12 address, listed name, listed address, then
13 you'll see the service address and then the
14 billing address.
15 MR. SRINTVASA: Okay.
16 MS. LAWSON: So it is unique
17 fields for the listed versus the service versus
18 the billing.
19 MR. SRINTVASA: It's not
20 necessarily because of error those two are
21 different because the end-use customer wanted it
22 that way, that's why you have them?
23 MS. LAWSON: That's correct. In
24 fact, a lot of times you'll have a large
25 business customer that all their bills for maybe

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1 ten states, their businesses in ten states, will
2 go to a single address.
3 So, I mean, it's not just in a campus
4 environment. It's also that they'll go to a
5 corporate accounts payable headquarters.
6 MS. KETTLER: This is Patti
7 Kettler with Birch Telecom again.
8 If I might clarify a few things. The
9 issue is with the service location address as
10 opposed to the billing address. And what exists
11 in CRIS can be multiple service locations,
12 addresses for the same physical location.
13 For example, at one point when a
14 customer first subscribes and they order five
15 lines, it might be typed in as "Suite 101" or
16 "101 North Street." And two or three years
17 later, the customer will subscribe to three
18 additional lines, and there may have not been a
19 PREMIS edit that was in place at that point in
20 time, and the customer service rep would type a
21 suite of 1-O, the letter "O" as opposed to zero
22 one.
23 What we have presented to Southwestern
24 Bell and was finally acknowledged in their
25 effort to remove the address that it is on

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1 migration, the problems that are caused by this,
2 and that's why they removed it.
3 We have provided examples where we're
4 required to enter maybe as many unique LSRs as
5 there are unique service location addresses in
6 the CRIS system so that we could get orders to
7 process through.
8 MS. NELSON: Okay. Are you
9 referring to -- have you integrated -- has Birch
10 integrated EDI and DataGate or are you referring
11 to LEX.
12 MS. KETTLER: I'm referring to
13 LEX, the GUI interface.
14 MS. NELSON: Okay.
15 MS. KETTLER: We have not yet
16 converted.
17 MS. NELSON: Okay. Because we're
18 really at this point focusing on EDI and
19 DataGate, so --
20 MS. KETTLER: The underlying
21 problems remain the same in terms of the source
22 data and how they're processed. They are just
23 different entry vehicles to get the information
24 to Southwestern Bell.
25 MS. NELSON: Okay. I guess on

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1 some issues, they may remain the same; but on
2 parsing, for instance --
3 MR. SRINIVASA: See --
4 MS. NELSON: On parsing, do they
5 remain the same between LEX and EDI?
6 MS. CHAMBERS: Well, I think what
7 we were getting to was the -- you still have the
8 same problems associated with address. I mean,
9 perhaps not on the front end but on the back
10 end.
11 MS. NELSON: So you're saying it's
12 not really a parsing problem, it's an address
13 problem?
14 MS. CHAMBERS: It's both. I mean,
15 for our experience, it is a parsing problem, and
16 then it also is a back-end problem.
17 MR. SRINIVASA: Now, if there is
18 one office complex, if there are multiple
19 tenants -- okay? Say, for example, 10 levels,
20 first two levels is Company A and they have a
21 telephone number, and Company B is on the rest
22 of the floors, and they have different sets of
23 telephone numbers. When you enter those
24 telephone numbers, you get two different
25 addresses for the same premise or is it entered

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1 wrong or --
2 MS. KETTLER: It's physically the
3 same physical address --
4 MR. SRINIVASA: Okay.
5 MS. KETTLER: -- for a single
6 customer. It's just over the years -- and these
7 customer records have been out there for 10 or
8 15 years under multiple versions of PREMIS, and
9 they've simply typed in incorrect addresses over
10 time.
11 MR. SRINIVASA: They use that
12 today. It's a common database. If you are
13 experiencing error, they will also experience
14 the same error.
15 MS. LAWSON: This is Beth Lawson --
16 MS. KETTLER: They do not
17 experience it as a CLEC does because a CLEC is
18 faced with going in to a customer and converting
19 their entire book of business, where in all
20 reality and practicality today, Southwestern
21 Bell does not do that. What they do is, they go
22 in and they add new lines to a customer account.
23 When they add those new lines, then we're both
24 on common grounds.
25 But most of the CLECs today are doing

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1 conversions; hence, Southwestern Bell has
2 recognized this problem and that's why finally,
3 as a consequence of their 271 proceedings,
4 agreed to on-street migrations, eliminate the
5 need for an address.

6 MS. NELSON: Ms. Lawson?

7 MS. LAWSON: This is Beth Lawson
8 with Southwestern Bell.

9 And I guess the databases that
10 Ms. Kettler is referring to are the same
11 databases that Southwestern Bell has used in
12 their retail operation for years. So that is
13 how the data was populated, when there are
14 changes made to suites and locations that
15 buildings do, or apartment, then we get notified
16 of that and we update the databases to get those
17 in sync.

18 As municipalities change things, then
19 we add them. We also work, if new additions are
20 being built, to add these and load them into
21 PREMIS.

22 So there is ongoing work, but there is
23 activity that changes, suites that change to
24 apartment numbers or building numbers. Those
25 types of things, it's just the nature of the

1 record. So when you're pulling up and wanting
2 to talk to an end user, you pull up your
3 customer service record because it has all your
4 features, it has all of the service and
5 equipment, it has their listed, it has their
6 billing.

7 So when you're talking with a customer,
8 it is in effect a record of their account. This
9 is something that I would think the CLECs would
10 also create their own customer care record with
11 the appropriate information for their end-user
12 customer.

13 MR. SRINIVASA: Okay.

14 Ms. Chambers?

15 MS. CHAMBERS: Julie Chambers with
16 AT&T.

17 Just to circle back for a second, on
18 the issues that we've been talking about, you
19 know, AT&T, just as MCI indicated, I mean, had
20 the goal, and in certain cases it is easier to
21 integrate certain fields within pre-order and
22 order. But we have asked for documentation,
23 we've asked for support from Southwestern Bell
24 and have not received it.

25 Now with the potential, you know,

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1 business of how locations happen.

2 And, like I said, it's what we
3 experience in our retail world with change
4 activities. So it may not be that we're doing a
5 new connect, but we're doing change activity.
6 And if we're sending somebody out to a location,
7 we have to have a correct service address, so we
8 do experience those same types of things.

9 MR. SRINIVASA: Let me ask, what
10 is in your PREMIS database, is validated against
11 the master street address guide, the MSAG, which
12 is the 911 type of database? You do validate
13 them -- or compare them to what is there and
14 ensure that it is accurate, don't you?

15 MS. LAWSON: My understanding of
16 the 911, yes, does get validated. And that's
17 what, when we're doing the validation, because
18 there were a lot of streets that became streets
19 as a result of 911 that then we went in and
20 updated our CRIS records to reflect that.

21 MR. SRINIVASA: Well, the CRIS is
22 a billing record.

23 MS. LAWSON: CRIS is a billing
24 system, but it has the customer service record
25 which contains the service address on that

1 removal of the address requirement, you know,
2 we're not sure what the impacts are going to be
3 on rejects. I mean, we've yet to see it happen.

4 Today in the environment -- actually,
5 if you think back to the ordering-with-
6 specificity requirement, you know, several years
7 ago, now suddenly something that we never
8 thought we should have had to provide that's
9 caused us all this angst over the past few years
10 is now not going to be provided.

11 So, yes, it's a good thing, but it
12 doesn't take away from all the difficulties that
13 we've had as CLECs in learning this business.

14 And, you know, with some of the issues
15 we've talked about from a scalability issue and
16 the things that fall out from manual handling,
17 you know, for conversions, it's different than
18 for Southwestern Bell Retail. So the database
19 mismatches and things like that do affect the
20 CLECs, and we're just not sure what the impacts
21 are going to be, you know, as volumes increase.

22 MR. SRINIVASA: If address
23 information is no longer required for
24 conversions, then as far as conversions are
25 concerned, you wouldn't be impacted on a

<p>Page 49</p> <p>1 going-forward basis, would you agree, 2 specifically that's attributable to rejects 3 associated with address? 4 I mean, if address is no longer -- 5 incorrect address being provided to an LSR is no 6 longer an issue because then they're just going 7 to disregard that. They'll take the telephone 8 number, whatever address they have -- this is 9 only on conversion orders -- and they will go 10 ahead and convert it, so -- 11 MS. CHAMBERS: From a front-end 12 perspective, I mean, ideally we would not see, 13 you know, the problems that we've seen with 14 rejects. 15 MR. SRINIVASA: Okay. 16 MS. CHAMBERS: We've yet to see it 17 happen. I mean, we're still going to have new 18 connects and migrates with news that require 19 addresses. And still, if you do not have the 20 logic in your system to effectively, you know, 21 do the integration, then you're going to be at a 22 disadvantage in those areas. 23 MS. NELSON: What percentage of 24 your orders will be conversions in contrast to 25 new service, and who will serve them?</p>	<p>Page 51</p> <p>1 MR. SRINIVASA: So when they say 2 "validate," that's validated against the master 3 street address guide from the 911 database? 4 MS. CHAMBERS: And it's validated 5 against PREMIS. 6 MS. LAWSON: This is Beth Lawson. 7 Yes, it's validating against PREMIS 8 that it's a valid street address. And again, 9 with EDI/CORBA, that is already parsed. So per 10 the industry standards, those fields are already 11 parsed and can be populated on the LSR. 12 MS. NELSON: I would like someone 13 from Southwestern Bell to respond to the 14 statement by Ms. Chambers that they have been 15 requesting help in integrating and have not been 16 given help. 17 MR. BANNECKER: This is Bob 18 Bannecker, Southwestern Bell. I'm an account 19 manager. 20 I'm not aware of any situation where 21 AT&T has come to the account team and asked for 22 specific information that we have not answered 23 to. We have been extremely responsive, I think, 24 you know, in providing whatever data that, you 25 know, we can provide and make available. I'm</p>
<p>Page 50</p> <p>1 MS. CHAMBERS: Julie Chambers with 2 AT&T. 3 I would estimate, you know, 10 percent. 4 MS. NELSON: Would be conversions? 5 MS. CHAMBERS: Would be news. 6 MS. NELSON: Okay. 7 MR. SRINIVASA: "New" means - 8 MS. CHAMBERS: But that's just -- 9 I'm not sure about, you know, migrate with new 10 lines, which is a common, you know, request from 11 the industry right now or from our customers. 12 MR. SRINIVASA: When you say "new 13 lines," is it second lines? For example, you 14 consider that as a new line or -- 15 MS. CHAMBERS: No. I was just 16 clarifying. I think it's -- well, it could 17 include both, I guess, new connects, and that's 18 just an estimate. 19 MR. SRINIVASA: Anything new, they 20 wouldn't have address information, you would 21 have to provide that? 22 MS. CHAMBERS: That's, Nara, when 23 it requires address validation, which you still 24 need to validate that it's a premise or it's a 25 valid street address.</p>	<p>Page 52</p> <p>1 not sure that I understand what it is that AT&T 2 is still waiting for us to provide. 3 MS. LAWSON: And to our 4 knowledge -- this is Beth Lawson -- we have had 5 no requests from any CLEC for technical 6 assistance on working on integration of 7 pre-order and order. 8 MR. SRINIVASA: Let me ask you 9 this: The two CLECs that successfully 10 integrated, have they sought any type of 11 technical help from you or any documentation 12 that -- 13 MS. LAWSON: When I say "technical 14 assistance," they received the normal 15 documentation that's available, but it wasn't 16 like, "I can't figure it out. Can you get your 17 SMEs on a conference call and we need to sit 18 down and talk about this." 19 The point I was trying to make is, 20 we've had CLECs, but based on the documentation 21 that is available to them, have been able to 22 integrate pre-order and order and to be able to 23 parse the information. And we have it done with 24 EDI, with CORBA, and with DataGate. There's 25 only two that have publicly come forward, and</p>

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1 those were utilizing DataGate. We do have a
2 vendor that is trying to go national, and he has
3 used one of the other interfaces. But they were
4 able to do this with the documentation.

5 We have a group called the OSS Customer
6 Support. When they're coming up on
7 implementation for an interface, we usually go
8 through a joint implementation process. We do
9 this with EDI ordering. We've done this. We
10 have daily conference calls. We work with them
11 to make sure they interface before they go into
12 production.

13 We do the same thing on the EDI and
14 CORBA pre-order interfaces as well as DataGate.
15 But they have been able to do the integration
16 and have not requested any special technical
17 assistance. If they had done that, we would be
18 more than willing to sit down and work with them
19 if they're having problems with doing that
20 integration.

21 MS. NELSON: I guess I would like
22 to know from AT&T what specific information that
23 you've requested that Southwestern Bell has not
24 provided?

25 MS. CHAMBERS: Our technical SMEs

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1 have been asking since November of '98 for the
2 specific parsing conventions and actually for
3 Southwestern Bell to provide, you know, parsed
4 addresses via DataGate. I mean, there's been,
5 you know, several discussions over the past few
6 years.

7 But then as recently -- at our account
8 team meeting back in February, we actually have
9 a request again for the parsing documentation.
10 You know, if Southwestern Bell successfully did
11 it for EDI/CORBA, which is the front end to
12 DataGate, then could we also have that technical
13 documentation to assist us in doing the same
14 thing?

15 MS. NELSON: Southwestern Bell?

16 MS. LAWSON: This is Beth Lawson.

17 This issue Ms. Chambers says has been
18 an issue since November '98, this has never been
19 brought up in any of the collaborative
20 processes, the workshops.

21 Also when EDI/CORBA was implemented,
22 the way this was implemented, there are choices
23 on how you can implement it, whether you do it
24 concatenated or whether or not you do it
25 individually parsed.

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1 Southwestern Bell was moving forward
2 with doing the concatenation. This was not
3 raised as an issue. I have the copy of the
4 accessible letter that went out with the
5 implementation of EDI/CORBA dated March -- I'm
6 having to -- I got new contacts; I have trouble
7 seeing. I'm getting like Liz, I'm going to have
8 to get my half glasses -- March 24th -- Bob read
9 it for me -- and they're talking -- no, this
10 couldn't be. I must have the wrong accessible
11 letter because this went out in '98. I mean,
12 '99 was the implementation of EDI/CORBA.

13 The point I'm trying to make is, when
14 we implemented EDI/CORBA, there was no issue
15 about us implementing the concatenated for the
16 customer service record. This was not brought
17 up as an issue, that this is not how we want to
18 move forward. So we have no request from any
19 CLEC that requested when we implemented
20 EDI/CORBA pre-ordering, that this be a
21 requirement.

22 MS. NELSON: You indicated that
23 AT&T hadn't asked for parsing documentation in
24 any collaborative sessions or anything. Have
25 they asked your account managers for parsing

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1 documentation?

2 MR. BANNECKER: This is Bob
3 Bannecker, Southwestern Bell.

4 Any parsing discussion, we provided
5 everything that we have documentation-wise on
6 parsing. I think to Ms. Chambers' point, what
7 they were asking for is for us to provide the
8 parsing functionality in DataGate which at the
9 time we said was not available.

10 MS. CHAMBERS: Julie Chambers with
11 AT&T.

12 I think we've asked for both. But I
13 have an e-mail where, you know, we actually
14 said, "Is there a set of requirements that SWBT
15 can provide to AT&T for parsing?"

16 And, Bob, I know that you're familiar
17 with Bill Frost and, you know, the many
18 discussions that have occurred without, you know,
19 even our involvement around these issues. So
20 it's not a new issue by any means from AT&T's
21 perspective.

22 MR. BANNECKER: This is Bob
23 Bannecker again with Southwestern Bell.

24 To that point, though, I do know that
25 Bill early on had requested some information on

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1 how we mapped our systems. But I think the
2 response that we gave back to AT&T was that we
3 cited some industry documentation that indicated
4 that's how we had our mapping set up. So, I
5 mean, that was the response that we provided
6 back.

7 MS. CHAMBERS: In speaking with
8 our technical people -- and I would like to
9 think that we have some very competent
10 developers on our project -- and they have
11 indicated that it to date has not been helpful
12 what has been provided.

13 MS. LAWSON: And this is Beth
14 Lawson with Southwestern Bell.

15 And the only response I can give is, we
16 know there's been at least five that have done
17 it with all three pre-order interfaces -- EDI,
18 CORBA, and DataGate -- so it has been done.

19 MS. CHAMBERS: But as far as, you
20 know, integrating address validation component
21 of DataGate with EDI/CORBA, you know, I'm not
22 aware that this is -- I mean, EDI ordering --
23 I'm not aware that it has been done.

24 Also in Sage's letter, they actually
25 indicate that there was documentation and

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1 technical assistance provided by Southwestern
2 Bell, so I'm surprised to hear today that no
3 technical assistance was provided to these other
4 CLECs.

5 MS. LAWSON: This is Beth Lawson.

6 As far as technical assistance, there
7 was no special request for us to sit down and
8 talk with them. They basically got the
9 documentation and then were able to implement
10 this.

11 And with EDI/CORBA, again that is what
12 the CLECs are normally using for address
13 validation because that is the industry standard,
14 and it's parsed.

15 MS. NELSON: Okay. On the 23
16 percent UNE-P orders or LSRs that were rejected
17 or were sent back as jeopardies, I wanted to go
18 back to AT&T. And one of the reasons you said
19 was invalid address. Can you identify anything
20 else?

21 MS. HALL: One thing I did want to
22 mention is the fact that we're receiving
23 jeopardies for what we think would be up-front
24 edits. For instance, invalid TN, invalid due
25 date is now coming back to us as a jeopardy;

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1 but, yet, we also receive LASR edits for those
2 types of errors as well. And so it's just
3 confusing to us as to why those types of errors
4 would be coming back in the jeopardy post-FOC.

5 MR. SRINIVASA: When you say
6 "invalid due date," you entered a due date that
7 was already past, and then --

8 MS. HALL: Exactly.

9 MR. SRINIVASA: It doesn't get
10 rejected up front in the LASR?

11 MS. HALL: That's my confusion.
12 Exactly.

13 MR. NOLAND: This is Brian Noland
14 with Southwestern Bell.

15 Just to make a point of clarification
16 from the earlier discussion on the jeopardy
17 notification, there are other reject reasons in
18 there -- you know, not specific to address --
19 that do cause us to have performance measurements
20 that are missed, just to make that point.

21 But to address the specific discussion
22 that we're having right now, I mean, we would
23 just have to look at each of the individual
24 instances to evaluate what it is that's causing
25 the reject or jeopardy notification to occur.

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1 MS. LAWSON: This is Beth Lawson.

2 I guess my request would be, if this is
3 occurring and you think you should have been
4 receiving it in an up-front, please bring it to
5 our attention and let's investigate and look at
6 it because if it is an edit that should have
7 been taking place and they've receiving on a
8 jeopardy, please let us know those, and we would
9 be more than willing to look at and try to
10 explain what has happened.

11 MS. HALL: I would like to do that
12 because just as of March, we had had 77
13 jeopardies come back for invalid due date.

14 MS. NELSON: Okay.

15 MS. CHAMBERS: And that's after
16 the due date has been confirmed on the FOC.

17 MS. HALL: The other thing is, we
18 had consistently asked for edits to be moved up
19 front, and we haven't been seeing, you know,
20 edits being moved up front to LASR, and now
21 we're seeing some that we thought were on LASR
22 now showing up as jeopardy.

23 MS. NELSON: From a percentage
24 standpoint, can you tell me what percentage of
25 invalid address or desired due date you would

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1 receive up-front rejects and what percentage you
2 would get in jeopardies?

3 MS. HALL: I know that 36 percent
4 is the percentage that we have for both address
5 and what we would consider what should be
6 up-front edits, like invalid due dates and
7 invalid TN.

8 MR. SRINIVASA: Let me ask you
9 this: You've sent out an LSC. and they sent you
10 the firm order confirmation back with the due
11 date. Could you supplement the order after
12 that, they came back and told you the due date
13 cannot be met? Order supplements cannot flow
14 through.

15 MS. HALL: This is not a
16 supplement issue. This was just an order that
17 had a due date on it, passed the LASR errors,
18 went through SORD. and then we received a
19 jeopardy, a 1T jeopardy code, the description
20 being invalid due date or invalid TN.

21 MS. NELSON: Okay. So 36 percent
22 of orders -- LSRs that came back for invalid TN
23 or invalid address -- I mean, invalid address or
24 desired due date came back as jeopardies?

25 MS. HALL: Right. Actually, those

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1 are all -- that percentage was all of the errors
2 that we would think should be up front and not
3 coming back as jeopardy.

4 MR. NELSON: Okay. So what would
5 the --

6 MS. HALL: And that actually would
7 be 36 percent for UNE-L orders.

8 MS. NELSON: Okay. What would the
9 total universe of those be? Could you describe
10 them? You said telephone number, desired due
11 date, address. Is there anything else that
12 would be included?

13 MS. HALL: Invalid feature is
14 another one. It looks like that's about it.

15 MS. NELSON: Okay. And does
16 somebody from Southwestern Bell want to respond
17 to that?

18 MS. EGGEN: Yes. This is Mary Ann
19 Eggen, Southwestern Bell.

20 We have had conference calls with AT&T.
21 During the month of March, I believe we were --
22 the beginning of March, we were on daily
23 conference calls with the AT&T centers, Julie
24 Chambers and Lori Hall.

25 We have now moved down -- we've gone to

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1 three days a week and then twice a week, and now
2 we have decided, as of next week, one day a week
3 we will continue these conference calls.

4 In those conference calls, these
5 jeopardies have not been questioned as far as
6 asking for Southwestern Bell's assistance from
7 the LSE or the account team, as far as I'm
8 aware, in explaining why they are receiving
9 invalid or jeopardies on due dates, invalid TNs,
10 address and invalid feature specific to the
11 jeopardy process or why those items are being
12 returned as jeopardies.

13 The invalid due dates that we're
14 receiving are due dates -- invalid due date
15 interim, invalid due dates as far as requesting
16 due dates on holidays or weekends, situations
17 such as that.

18 MR. SRINIVASA: The LASR edit did
19 not catch those. It was a weekend.

20 MS. EGGEN: That is correct.
21 We're speaking simply of the jeopardy process
22 which is after FOC.

23 MS. CHAMBERS: This is Julie
24 Chambers with AT&T.

25 And we have had extensive conversations

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1 about jeopardies and in learning about the
2 different categories that Southwestern Bell --
3 because this is new to AT&T as well -- the
4 different categories. So to say that -- you
5 know, I think it does go back to the fact that,
6 you know, we've thought a lot of these edits
7 were going to be moved up, you know, over the
8 past couple years, and now they're still
9 actually showing up as jeopardies.

10 And to find out an invalid due date
11 that late in the process, after the FOC has
12 confirmed the due date, is concerning. And I
13 think the calls continue, and we're continuing
14 to learn more about the processes.

15 I think initially we were working to
16 make sure that the processes were working, that
17 we were getting the new due dates for
18 notification of due date and things like that.
19 And we're working through the processes, and
20 jeopardies has been a major issue discussed on
21 the calls.

22 MS. NELSON: From Southwestern
23 Bell, can you explain in what instances you
24 would -- an invalid due date would reject back
25 and then also in what instances you would get a

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1 due date back as a jeopardy instead of a reject?
2 MS. WEGER: This is Misty Weger,
3 Southwestern Bell.
4 A lot of the invalid due dates that we
5 see on AT&T's jeopardies are generally when they
6 have jumped the due date board, and it's not
7 always necessarily the due date board wasn't
8 looked at or something --
9 MS. NELSON: Could you explain
10 that --
11 MS. WEGER: Sure.
12 MS. NELSON: -- that sort of
13 lingo.
14 MS. WEGER: Sure. They'll send in
15 something that requires field work. Anything
16 that requires field work, as a general rule, you
17 go to the due date board, and I believe it's in
18 DataGate where you have that. They go in and
19 find the next available due date according to
20 the due date board.
21 MS. NELSON: So what you're saying
22 in essence is, the due date would be different,
23 depending on a field that was required or if
24 there was no field work?
25 MS. WEGER: Absolutely.

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1 MS. NELSON: Okay.
2 MS. WEGER: Yes. They'll send it
3 in, and maybe, you know, we show that the 6th is
4 the next available due date, and they have sent
5 in the 4th or the 5th or whatever. So we would
6 reject that, jeopardy in these cases back for
7 invalid due date.
8 MS. NELSON: Okay. Why would it
9 come back as a jeopardy and not as a reject?
10 MS. WEGER: Because there is no
11 LASR edit on those types of things. There is a
12 LASR edit -- and I'm not completely familiar
13 with all of them -- but I know that a lot of the
14 LASR fatals that they get back on due dates or
15 when they send in the previous day due date or a
16 day that has to be today or future, is the LASR
17 edit that they get. They send it in yesterday's
18 due date or, you know, last week's due date or
19 something.
20 MS. NELSON: So, in other words,
21 if a CLEC made a mistake and gave no field work
22 due date instead of a field work due date,
23 that's not caught up front as LASR edit, that
24 doesn't get sent back until it's a jeopardy
25 after --

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1 MS. WEGER: That's correct.
2 MR. BANNECKER: This is Bob
3 Bannecker, Southwestern Bell.
4 I just wanted to clarify: The only
5 LASR edit that's out there is that LASR
6 validation. The due date that's given on the
7 order is not prior to today. That's the only
8 LASR edit there is for due dates.
9 MS. NELSON: Okay. Does that
10 differ from AT&T's understanding?
11 MS. HALL: Yes, because we've had
12 instances where --
13 MS. NELSON: Could you stand up,
14 please, and identify --
15 MS. HALL: Lori Hall with AT&T.
16 And we've had instances where, you
17 know, we select a due date from the due date
18 board, you know, at 12 o'clock noon. By the
19 time it gets to Southwestern Bell and they work
20 the order, it's past 3 o'clock, and so we get
21 a -- I'm sorry, not past 3 o'clock, but that due
22 date is not available anymore, and we get an
23 invalid due date error up front for that.
24 Also I wanted to bring to your
25 attention -- I was just looking at my list of

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1 all the jeopardy reasons. Another reason we get
2 jeopardies would be for requested due date is
3 less than published interval. So, to me, that
4 would mean that -- I mean, perhaps the due date
5 board might -- I mean, if we're selecting a due
6 date off the due date board and getting a
7 jeopardy, a post-FOC error jeopardy type for
8 published interval, you know, invalid due date,
9 because we're less than the published interval,
10 another category, and it should be up front.
11 MR. NOLAND: This is Brian Noland
12 with Southwestern Bell.
13 I guess without knowing all the
14 particulars in that situation that was just
15 described -- I mean, the type of order that was
16 requested, because of the UNE intervals that we
17 have for due dates as opposed to other types of
18 services, so I'm just not real clear about, you
19 know, what that example that was given then.
20 MS. KETTLER: This is Patti
21 Kettler with Birch Telecom.
22 If I might reinforce, we were very
23 actively involved, after this process change
24 occurred in January, with the post-FOC jeopardy
25 process because there was very little

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1 documentation of a process change, and no one
2 really knew what was going on. We did in-depth
3 analysis from January through February because
4 we have like a five-fold increase in jeopardies.

5 As a result of that weekly conference
6 call analysis, we saw a decline because they
7 started yelling in the field, "You can't do
8 this. This is inappropriate," or whatever, and
9 we are now seeing it begin to increase because
10 we haven't continued to manage it, micromanage
11 it on a daily or weekly basis with the LSC.

12 But the problem is resurfacing again.
13 And as with many other issues that we've had of
14 a manual nature, we will begin revisiting this
15 issue with Southwestern Bell in our weekly
16 conference calls because the volumes are
17 dramatically increasing again.

18 MR. MURRAY: Judge Nelson, if I
19 might? I mean, I think we've gotten far afield
20 from the integration discussion that we were
21 having. We don't have the people here that we
22 need to respond to claims like this, on
23 jeopardies in particular. I think that a lot of
24 things that's been raised that are not
25 accurately stated that, you know, we're not

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1 prepared to respond to simply because we weren't
2 aware that they were going to be raised here.

3 MS. LaVALLE: Kathleen LaValle for
4 AT&T.

5 PM 9 was specifically on the
6 Commission's agenda for today, which is the rate
7 of rejects. And part of the story of the rate
8 of rejects which, although the numbers still
9 remain alarmingly high -- I think it's 31
10 percent on an all-CLEC basis -- that we wanted
11 to make it clear that a shift has taken place so
12 that some of those -- and some of the longest
13 return rejects have now been recategorized into
14 jeopardy. So I think our responses are all very
15 directly apt to the topics that have been
16 included for today's discussion.

17 MS. NELSON: My question to AT&T
18 and all the CLECs would be to ask if this issue
19 has been raised before today?

20 MS. LaVALLE: Yes.

21 MS. MURRAY: I might respond to
22 that.

23 Particularly the jeopardy issue was put
24 in place at AT&T's specific request during
25 Docket 21000 meeting, so this is something that

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1 was done to accommodate AT&T and to deal with
2 what AT&T said was the proper way to be handling
3 it, so that's the way it's been put in place on
4 the issue of jeopardy occurring post-FOC.

5 MS. NELSON: Okay. We're going to
6 go off the record and take like a 20-minute
7 break. And in the interim I would like
8 Southwestern Bell and AT&T to talk about this
9 and try to figure out what common ground there
10 is because it does seem to be inconsistent with
11 what we've been hearing on a staff level.

12 Yes, Mr. Cowlshaw.

13 MR. COWLISHAW: Pat Cowlshaw for
14 AT&T.

15 I just wanted to mention before you
16 closed out the record at the moment, that AT&T
17 did make specific proposals of performance
18 measures around jeopardy notices and specifically
19 going to this point of the category of jeopardy
20 notices that are the result of these post-FOC
21 edits that are now, instead of resulting in a
22 manual reject, are now resulting in the creation
23 of this new category of jeopardy. So in terms
24 of germaneness to today's discussion, I think we
25 have teed this up.

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1 MS. MURRAY: But when that issue
2 is prepared -- you know, when we're all prepared
3 to discuss this issue, which I think is
4 elsewhere in the matrix.

5 MS. NELSON: Okay. We'll, we're
6 going to come back in 20 minutes. And in the
7 interim, I would like for everybody to discuss
8 this.

9 Let's go off the record.

10 (Off the record: 10:29 a.m.-11:16 a.m.)

11 MS. NELSON: Let's go back on the
12 record, then.

13 Off line, AT&T and Southwestern Bell
14 talked about the issues that we were discussing
15 before the break. And my understanding is,
16 you're ready to report back?

17 MS. MURRAY: That's correct.

18 MS. NELSON: Okay.

19 MS. LaVALLE: Kathleen LaValle for
20 AT&T.

21 AT&T and Southwestern Bell
22 representatives met over the course of the break
23 and discussed the occurrence of jeopardy returns,
24 post-firm order confirmation and our concern
25 that those were in effect deferred edit

<p style="text-align: right;">Page 73</p> <p>1 conditions.</p> <p>2 And I think what we were able to do is</p> <p>3 come to a common ground in identifying what the</p> <p>4 source of the concern is. And that is that AT&T</p> <p>5 would like to see an enhancement in the up-front</p> <p>6 edit capability from Southwestern Bell so that</p> <p>7 to the full extent possible, error conditions</p> <p>8 are detected at either the LASR or the MOG stage</p> <p>9 so that they can be electronically generated and</p> <p>10 a reject returned quickly.</p> <p>11 And I think we agreed that this is an</p> <p>12 issue -- enhancing the up-front edit capability</p> <p>13 is an issue that has been a focus of AT&T and</p> <p>14 other CLECs' concerns throughout the</p> <p>15 collaborative, dating back to the original 271</p> <p>16 hearing.</p> <p>17 And also in Docket 19000, I know</p> <p>18 Ms. Murray and I worked together on that issue</p> <p>19 as well, and our concern is that in terms of</p> <p>20 jeopardies at best, first of all, you're still</p> <p>21 getting -- even if you don't look at the</p> <p>22 jeopardies, you're still having 35 percent of</p> <p>23 the rejects coming back, on an all-CLEC basis</p> <p>24 are coming back over the LASR GUI, meaning</p> <p>25 they're manually generated. So that is, as a</p>	<p style="text-align: right;">Page 75</p> <p>1 increase its up-front edit capability.</p> <p>2 MS. NELSON: Okay. And even with</p> <p>3 up-front edit capability, is it true that there</p> <p>4 still will be jeopardies returned from time to</p> <p>5 time or a certain percentage of the time for</p> <p>6 addresses or due dates?</p> <p>7 MS. WEGER: Absolutely -- this is</p> <p>8 Misty with Southwestern Bell Telephone --</p> <p>9 absolutely. Something that came up before the</p> <p>10 break was that they weren't getting addresses</p> <p>11 and that that should be, that there is a</p> <p>12 validation process up front to validate that.</p> <p>13 What happens is, in our PREMIS</p> <p>14 database, we validate against a range. The way</p> <p>15 PREMIS works is, for instance, on a particular</p> <p>16 street, perhaps 200 through 1000 are valid</p> <p>17 addresses. There may only be homes or business</p> <p>18 or whatever at 204 and 208 and 212. But if you</p> <p>19 try to validate 205, it will pull up and say</p> <p>20 that, "Yes, this is in the valid range on that</p> <p>21 street" and will validate, saying, "Yes, this is</p> <p>22 a good address."</p> <p>23 So they could send over, you know,</p> <p>24 anyone. This happens in retail as well, but</p> <p>25 this is the exact way that it works there. They</p>
<p style="text-align: right;">Page 74</p> <p>1 stand- alone statistic, an issue of concern.</p> <p>2 The implementation that took place on</p> <p>3 January 17th that converted post-FOC rejects</p> <p>4 into jeopardies has the following two impacts on</p> <p>5 the performance measure data that's reported:</p> <p>6 First of all, it will artificially decrease the</p> <p>7 number of rejects reported in PM 9 --</p> <p>8 MS. MURRAY: Judge Nelson, if I</p> <p>9 might --</p> <p>10 MS. LaVALLE: -- and some of those</p> <p>11 have been shifted over --</p> <p>12 MS. NELSON: Okay. Yes. I really</p> <p>13 want to know --</p> <p>14 MS. MURRAY: -- this is going way</p> <p>15 beyond what we agreed to here.</p> <p>16 MS. NELSON: I just want to know</p> <p>17 what the common ground is on.</p> <p>18 MR. LaVALLE: The common ground, I</p> <p>19 think, is that we've identified that it's really</p> <p>20 an issue of long-standing, not a new issue. The</p> <p>21 only change is that now some of those late-</p> <p>22 returned manual rejects are coming back as</p> <p>23 jeopardies, and I think that the companies are</p> <p>24 going to be analyzing those returned, and AT&T</p> <p>25 will continue to urge Southwestern Bell to</p>	<p style="text-align: right;">Page 76</p> <p>1 could send 205, whatever street, and it would</p> <p>2 validate. And until that technician went out to</p> <p>3 205 and said -- they would call back in to us</p> <p>4 and say, "Hey, there is no 205, that this is</p> <p>5 invalid," and that's why they get the field</p> <p>6 visit determined address invalid. That's why</p> <p>7 that jeopardy goes back.</p> <p>8 MS. NELSON: Okay. And --</p> <p>9 MS. WEGER: So there still will be</p> <p>10 instances where they'll get an invalid address.</p> <p>11 MS. NELSON: Okay. And going back</p> <p>12 a minute, Ms. Murray, did you have anything to</p> <p>13 add in terms --</p> <p>14 MS. MURRAY: Yes.</p> <p>15 MS. NELSON: -- of what you</p> <p>16 discussed during the break?</p> <p>17 MS. MURRAY: Yes. I think I just</p> <p>18 wanted to make sure that it was clear to the</p> <p>19 Commission that this is not something new that</p> <p>20 has recently developed that is creating an issue</p> <p>21 that wasn't here before. This is a continuation</p> <p>22 of the issue related to Southwestern Bell and</p> <p>23 AT&T's request that Southwestern Bell move as</p> <p>24 many edit conditions, SORD edit conditions as</p> <p>25 possible into the up-front systems.</p>

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1 We worked with AT&T collaboratively on
2 doing that for quite some period of time. Misty
3 and the AT&T representatives have a meeting and
4 conference calls to discuss these issues. We'll
5 continue to work and try to move as much of
6 these edits up front as we can, working
7 collaboratively together to do that.

8 MS. LaVALLE: And our concern,
9 obviously, is we would have liked the progress
10 to have come further at this point because it
11 has been an issue of such longstanding.

12 MS. MURRAY: And, you know, moving
13 edits up is something we're doing on a continual
14 basis through changed management and otherwise,
15 and we're going to continue to work that
16 process.

17 MS. LaVALLE: We had two other
18 issues of clarification, just so we don't leave
19 them, if Ms. Chambers might be permitted to
20 address those briefly.

21 MS. NELSON: Okay. Do the
22 Southwestern Bell people have other
23 clarification also on the record?

24 Well, let's go ahead and start with
25 AT&T, then.

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1 MS. CHAMBERS: Julie Chambers with
2 AT&T.

3 I just thought I might try to settle
4 some of the disagreement and conversation that
5 we had prior to the break related to technical
6 assistance and documentation for parsing.

7 Actually, in Hamm reply affidavit, she
8 actually states that,

9 "AT&T initially requested Southwestern
10 Bell, via its account manager, to parse
11 information in DataGate in November 1998, and
12 that SWBT, in response, suggested AT&T wait for
13 EDI/CORBA."

14 So if we had waited for the
15 functionality in EDI/CORBA, we probably would
16 not still be in business -- I mean, we would not
17 yet be able to serve customers today.

18 Also, I think what was mentioned was
19 that nothing has been said in the collaborative.
20 If you think about the dates, the collaboratives
21 ended about November of the same time frame that
22 we were, you know, working with our account team
23 to try to, you know, either have Southwestern
24 Bell do the parsing or assist us in giving us
25 the documentation to do the parsing ourselves.

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1 On the same note, the final staff
2 status report required that the ability to
3 integrate DataGate pre-order and EDI order be
4 evaluated, and that was not tested. So to date,
5 there is no commercial data reporting that there
6 is an ability to integrate EDI/CORBA and EDI.

7 So I just wanted to clarify that. But
8 I think overall, if you're kind of wondering
9 where do we stand as of today, this is kind of
10 relating to the parsing issues. And then if you
11 look at where do we stand as of 5/27, I guess is
12 the address -- is the next release -- I think
13 after the address requirement is removed for
14 conversion, you will still have the parsing --
15 as we mentioned previously, you will still have
16 the parsing issues for some order types that
17 we've talked about previously, the new -- the
18 migrate with new.

19 We would have to then reevaluate the
20 reject statistics and the actual just reject
21 experience after the implementation of that
22 release. I think we don't know what the impacts
23 will be because you receive the address edits.
24 And before you receive -- you know, for format
25 and things like that -- before you would receive

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1 any other edits. So I think we'll just have to
2 completely relook and reanalyze where we stand
3 from a reject basis at that point.

4 MS. NELSON: Okay. Would that be
5 appropriate in change management or in an OSS
6 users group format? Are you talking about
7 company-to-company?

8 MS. CHAMBERS: I'm just saying
9 that in general, if you're asking what are the
10 impacts going to be from this release, you know,
11 we don't know. I mean, I think we're going to
12 have to look at it at that point because it does
13 change the landscape of what we've been looking
14 at to date.

15 And then I think again we have to see
16 it implemented. It is an expedite release.
17 It's, you know, a short time frame to
18 implementation, and I think all CLECs have
19 expressed concern in change management about
20 expedite releases and the testing; you know,
21 platforms currently available. So I think that,
22 you know, we'll see it implemented, we'll have
23 to, you know, then take a look at the actual
24 impacts and benefits thereof.

25 Again, you will have the mismatch issue

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1 of Southwestern Bell's databases, the CRIS and
2 PREMIS mismatches. I'm just kind of taking us
3 through: What have we talked about? Where are
4 we really going to be? I'm just trying to put
5 some framework around --
6 MS. NELSON: Okay. Staff can come
7 to closure on it.
8 MS. CHAMBERS: Okay.
9 MS. NELSON: We've got questions.
10 MS. CHAMBERS: Okay.
11 MS. NELSON: So rather than just
12 have you come to closure on everything, I think
13 what we would like to do is ask some follow-up
14 questions and then come to closure on this.
15 MS. MURRAY: Could we reply, just
16 briefly?
17 MS. NELSON: Yes.
18 MS. LAWSON: This is Beth Lawson
19 with Southwestern Bell. And in regard to the
20 request of parsing and DataGate, AT&T did
21 request that, and we stated that was not
22 something we had planned to do, and they dropped
23 it. When I said asking for technical
24 assistance, they didn't ask for us to sit down
25 and work with their programmers because they

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1 didn't know where the delimiter was or where the
2 field was.
3 Also when we introduced EDI/CORBA --
4 and I have the correct accessible letter now.
5 It was June 25, 1999 -- there was no issue
6 raised by the CLECs that when we implemented
7 EDI/CORBA, that we were not parsing the CSR in
8 that new interfaces that we were offering up.
9 And again, with address validation, the EDI/
10 CORBA is already parsed.
11 And with regard to the change on the
12 service address, this is what we're doing today
13 for resale. And as we have been doing that for
14 a long period of time, there hasn't been an
15 issue about the wrong TN being populated.
16 And in the walk-through that we had
17 with AT&T, we did state that we would monitor
18 this, as they said they would like to watch.
19 This is something we do with any change that we
20 implement. If there's something different, then
21 we'll look at another process improvement or
22 enhancement. But this has been done in resale,
23 so this isn't something new being done; it's
24 just being done for a different order type.
25 MS. NELSON: Okay. Is anybody

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1 here from Sage or Navigator?
2 Okay. My understanding is that MCI
3 also had wanted to discuss some other issues
4 with regard to integration.
5 MR. GOLDMAN: This is Marc Goldman
6 for MCI WorldCom. I just want to frame the
7 issues very quickly and then move on. Our
8 subject matter expert talked about the --
9 MS. NELSON: Really, in this
10 process -- I know you're new to this process --
11 we really let the subject matter experts frame
12 the issues. So if there is something
13 specifically you guys want to respond to that
14 has been discussed today, you know, that would
15 be what we would be interested in hearing.
16 MS. McMILLON: Terri McMillon, MCI
17 WorldCom.
18 Some of the things that we wanted to
19 make sure were on the record were just
20 reiterated by AT&T. We are concerned about
21 subsequent transactions that occur on these
22 conversion orders, the address change that will
23 be taking place in May, which we actually put
24 forward as a CLEC change request because we were
25 looking for something to give us immediate

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1 relief for our end user to keep from orders
2 being delayed. We looked at that as an interim
3 solution to getting a more permanent solution
4 which we considered to be fully parsed fielded
5 CSRs.
6 The issues that aren't addressed is --
7 MS. NELSON: But you have been
8 able to do some parsing. Is that correct, MCI?
9 MS. McMILLON: Dave?
10 MR. BURLEY: Dave Burley, MCI.
11 Yes, we have. There are some fields in
12 pre-order that exactly match what is required in
13 the ordering field, and I picked out an ATN
14 earlier; that's an exact match so you can easily
15 integrate it, and nobody is having any problems
16 with that.
17 On the other side of the coin in the
18 service address concatenated field, there's
19 certain things in there that you might be able
20 to take apart. A community name, you know, is
21 always preceded -- pr always followed by a
22 comma, so you can build that logic in there.
23 But if you have to see any of the
24 rules, looking at USOC or any other SWBT
25 documentation relative to one of the values that

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1 are returned in a concatenated format identical
2 to the editing and values required on the
3 ordering side and then, two, where is the
4 thoroughfare value in the concatenated?
5 MS. NELSON: Does Southwestern
6 Bell want to respond to that?
7 MS. LAWSON: This is Beth Lawson
8 with Southwestern Bell.
9 And we do have documentation available
10 that identifies the fields laid out, and we can
11 work with your account manager to specifically
12 respond to those questions if you have them, but
13 we have provided documentation that details
14 that.
15 MS. McMILLON: And this is Terri
16 McMillon again.
17 We have been reviewing a lot of that
18 documentation, Beth, just like David said
19 earlier. But we are finding discrepancies where
20 in the pre-order documentation, the field lengths
21 will be ten characters, and in the order field,
22 it's eight characters. Well, that's not an
23 exact match. And it's very difficult, without
24 very specific business rules, to find out what
25 we need to send to keep from getting that reject

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1 again.
2 MS. NELSON: And then when you
3 find that inconsistency, do you contact your
4 account manager and ask: How are we supposed to
5 handle this?
6 MS. McMILLON: We will, yes.
7 MS. NELSON: Okay. But you
8 haven't so far?
9 MS. McMILLON: He's just been
10 doing the review.
11 MR. BURLEY: Dave Burley from MCI
12 WorldCom.
13 As a prelude to before you go through
14 that formal process, you would certainly access
15 the SWBT Web site, provided you have a valid
16 password and that nature there, and attempt to
17 secure. I mean, all we're reasonably
18 intelligent in this world, and we can work
19 through the business rules if they're finite and
20 complete.
21 The problem is like for a week and a
22 half attempting to get into the USOC manual.
23 Anybody getting in there was getting invalid
24 entry, no matter what you put into there; yet,
25 the CLEC community didn't even know that it

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1 wasn't available.
2 So you normally would take a process
3 prior to going through your account manager, of
4 reviewing it, the SWBT materials or other
5 materials located on Web site. If it gives you
6 the answer, it saves a lot of phone calls.
7 MS. LAWSON: This is Southwestern
8 Bell, Beth Lawson.
9 I guess my response will be, if you've
10 got any issues or questions, we'll be more than
11 happy to sit down and talk with you. Again,
12 we've had CLECs that have done this successfully.
13 MR. SRINIVASA: So did you have to
14 talk to those CLECs also? Did they have similar
15 type of questions?
16 MS. LAWSON: Not to my knowledge.
17 When we talked about the technical assistance,
18 the documentation that was provided to them,
19 they were able to utilize and implement the
20 integration.
21 MS. KETTLER: Birch Telecom looks
22 forward to taking advantage of these
23 opportunities, so I hope that here in the next
24 few weeks, that we'll have that same opportunity
25 to be exposed to the support systems, the

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1 complete documentation, et cetera.
2 MR. SRINIVASA: Also another
3 enhancement you had made to that process, you
4 added GEIS. General Electric, to help in that?
5 MS. LAWSON: That is correct, and
6 I mentioned that earlier, that as a consultant,
7 Southwestern Bell has contracted with GEIS to
8 act on the CLECs' behalf to come and consult
9 with you on your interfaces and any integration
10 or questions that you have.
11 MS. McMILLON: This is Terri
12 McMillon again from MCI WorldCom.
13 I just did want to set the record
14 straight. We have been working with our account
15 team and asking questions about EDI pre-order.
16 We did want to get that ball rolling and did
17 specify at that time that we were interested in
18 fully parsed CSRs.
19 In addition, way back when the meeting
20 that has been discussed by AT&T, we participated
21 in that. And during that meeting, we also
22 stated that we feel like it's very necessary to
23 have parsed CSRs.
24 MS. LAWSON: Can I just comment?
25 MR. SRINIVASA: Well, let me ask

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1 you this: EDI/CORBA. all fields are already
2 parsed. You're not using -- that's what --
3 MS. LAWSON: It's parsed for
4 address validation. For the customer service
5 record, it is not parsed, but Southwestern Bell
6 plans on implementing parsed CSR in June of
7 2001.
8 MS. McMILLON: Is that for the
9 common interface, Beth?
10 MS. LAWSON: The EDI/CORBA. yes.
11 MS. McMILLON: Okay. Could you
12 please repeat that?
13 MS. LAWSON: Southwestern Bell
14 plans on implementing parsed CSR in June 2001
15 for EDI/CORBA. And again, as I mentioned
16 before -- I'm getting clarification here from my
17 SME -- parsed address fields for the CSR.
18 And as I mentioned before, when we
19 implemented -- and I hate to keep bringing this
20 up -- but there was an issues list that was put
21 together with the implementation of EDI and
22 CORBA. and no CLECs raised it as an issue that
23 we could not move forward on the implementation
24 because we did not provide parsed CSRs. Again,
25 that was in June of 1999.

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1 MR. SRINIVASA: All of the
2 information in the CSR is going to be parsed, or
3 is it only the address?
4 MS. LAWSON: Just the address
5 fields.
6 MR. SRINIVASA: Okay.
7 MR. BURLEY: Dave Burley from MCI
8 WorldCom again. There already are --
9 MS. LAWSON: Let me --
10 MR. BURLEY: -- fields.
11 MR. LAWSON: Let me let the SME
12 clarify what EDI/CORBA has so I can make sure I
13 state it correctly.
14 MS. COX: This is Lori Cox.
15 Currently the CSR, via EDI and CORBA,
16 the majority of the fields are returned in a
17 parsed format, as was mentioned with the ATN
18 field. It's only the address fields that are
19 currently concatenated, and those are the fields
20 that we are going to investigate parsing by June
21 of 2001.
22 MR. SRINIVASA: Well, after that
23 is implemented, between EDI CORBA and
24 enlightenment, all the fields will be parsed to
25 an extent?

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1 MS. COX: That is correct.
2 MS. McMILLON: This is Terri
3 McMillon.
4 You said investigate or are?
5 MS. COX: We are planning to do
6 this.
7 MS. CHAMBERS: This is Julie
8 Chambers with AT&T.
9 Has that been documented anywhere?
10 MS. McMILLON: Right.
11 MS. COX: It is included in the
12 plan of record for the uniform OSSs.
13 MS. CHAMBERS: It is specifically
14 stated?
15 MS. COX: Yes, it is.
16 MS. CHAMBERS: Okay.
17 MS. McMILLON: Okay. Terri
18 McMillon again.
19 I am trying to get clarification -- I'm
20 trying to understand this whole address. And
21 forgive me if I should have known these
22 questions.
23 When Southwestern Bell ignores the
24 address that we sent on the CSR and populates
25 the address, they're doing that from the CRIS

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1 information. Correct?
2 MS. LAWSON: That is correct.
3 MS. McMILLON: Okay. My question
4 is, is that going to be automatically done by
5 the system? Is that going to be manually
6 entered? How is that going to be done?
7 MS. LAWSON: Today for one of the
8 service orders, the D order, it's already
9 populated from the customer service record. So
10 it will be exactly the same now for the C order,
11 that we will also populate that field, whereas
12 previously that field was populated on the
13 service order from the service address on the
14 LSR.
15 MS. McMILLON: Okay. So you don't
16 expect any increased manual fallout because of
17 this?
18 MS. LAWSON: No, this will be
19 mechanically generated. The service address
20 will be pulled from the customer service record
21 on the CRIS account database.
22 MS. McMILLON: Okay. And to the
23 question of delimiters, this information that we
24 have been given about commas and spaces,
25 providing delimiting for the address fields,

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1 that doesn't apply to directory listing. Right?
2 I mean, that still comes with no delimiters?
3 MS. COX: This is Lori Cox.
4 And I have no admit, I have not
5 investigated that. I do know that the rules
6 apply to the service address and the listed
7 address. I don't know about the directory
8 delivery address.
9 MS. LAWSON: This is Beth Lawson.
10 The directory delivery or the listed?
11 MS. McMILLON: Listing.
12 MS. LAWSON: Listed address.
13 MS. COX: Should have the same
14 values.
15 MS. McMILLON: And we had briefly
16 discussed mismatches in the address databases --
17 well, the databases that might contain address
18 information. And did you provide a percentage
19 of mismatched, an estimation of that? I missed
20 that.
21 MS. LAWSON: This is Beth Lawson
22 with Southwestern Bell.
23 No, I did not. My understanding, that
24 it's very minimal.
25 MS. NELSON: AT&T provided an

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1 estimate of 5 percent.
2 MS. McMILLON: Okay. So
3 Southwestern Bell doesn't have a --
4 MS. LAWSON: No.
5 MS. McMILLON: Okay. Is there any
6 plan -- the concern is still that we are going
7 to have address mismatches because they will
8 still be pulling the information from CRIS, and
9 downstream uses PREMIS. So we're still going to
10 have address mismatches that won't be fixed by
11 this release. And I guess it's important -- and
12 the CLECs tried to make this also an issue in
13 change management -- that this is not the
14 panacea to fix everything.
15 MS. NELSON: So what would your
16 suggestion be for the other address issue?
17 MS. McMILLON: Well, as far as the
18 address mismatches, I think there should be some
19 sort of concentrated effort to fix the databases
20 to make them consistent.
21 MS. LAWSON: This is Beth Lawson
22 with Southwestern Bell.
23 We're not sure where AT&T got the
24 5 percent or how that number was determined.
25 Southwestern Bell does not know of a number or

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1 percentage. This is the same situation we were
2 told when we sent orders through. Again, as I
3 explained, when municipalities send us updates
4 because of changes, they're updated in PREMIS,
5 and then we subsequently update it in CRIS so
6 that the records match.
7 There could be a timing in that the
8 service order hasn't posted and an LSR comes
9 through, but this should not be an issue that
10 causes any type of problems.
11 MS. McMILLON: Okay.
12 MS. NELSON: Are you saying that
13 your retail is affected similarly?
14 MS. LAWSON: If there is -- when
15 they go in to do a change order and it matches
16 against something, I mean, we have to update the
17 CRIS record to match PREMIS if there has been
18 some type of change that didn't get updated.
19 MS. NELSON: Is this an
20 integration issue or a database issue?
21 MS. LAWSON: It doesn't have
22 anything to do with integration at all.
23 MS. NELSON: Okay.
24 MR. SRINTVASA: A database
25 accuracy issue.

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1 MS. LAWSON: Yes, sir.
2 MS. LaVALLE: Kathleen LaValle for
3 AT&T.
4 It's an address validation issue, and
5 so it's a -- I think Beth would agree with
6 that -- so that, obviously, if the address
7 validation process checked against a consistent
8 record and a record that was the one being
9 edited against downstream, you wouldn't have a
10 mismatch occur. So I just wanted to make sure
11 we accurately defined what the issue was.
12 MR. SRINTVASA: Starting from the
13 month of May, my understanding is that you will
14 no longer reject because of the address
15 validation issues, conversion orders. Is that
16 correct?
17 MS. LAWSON: That is correct.
18 MS. LaVALLE: And will the CLECs
19 know when there has been a mismatch, that there
20 would have to be manual intervention at
21 Southwestern Bell's site?
22 MS. LAWSON: No. Southwestern
23 Bell will correct the customer service record to
24 update it, and they will handle that.
25 MS. LaVALLE: It will --